

Exhibit 3

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10 World Wrestling Entertainment, Inc.

11
12 UNITED STATES DISTRICT COURT

13
14 NORTHERN DISTRICT OF CALIFORNIA

15 MLW MEDIA LLC,

16 Plaintiff,

17 v.

18 WORLD WRESTLING ENTERTAINMENT,
19 INC.

20 Defendant.

Case No. 5:22-cv-00179-EJD

**DEFENDANT WORLD WRESTLING
ENTERTAINMENT, INC.'S
OBJECTIONS AND RESPONSES TO
MLW'S FIRST SET OF REQUESTS
FOR PRODUCTION**

Defendant World Wrestling Entertainment, Inc. (“WWE”) respectfully submits the following objections and responses (the “Responses”) to Plaintiff’s First Set of Requests for Production (the “Requests”).

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. WWE provides these Responses without waiver of, and intending to preserve, the attorney-client privilege, the attorney work product doctrine, the joint defense privilege, and any other applicable privilege, immunity, protection, or restriction available under the Federal Rules of Civil Procedure, federal statutes, and/or common law. The inadvertent revelation of information subject to any applicable privilege or protection, including, but not limited to, the attorney-client privilege or the attorney work-product doctrine, is not intended to be, and shall not operate as, a waiver of any such privilege or protection, in whole or in part.

2. WWE provides these Responses without waiver of, and intending to preserve:

a. All questions as to competency, relevancy, materiality, and admissibility of evidence for any purpose of WWE’s responses or the subject matter thereof, in this or any other action, and WWE’s responses are similarly not to be deemed an admission as to the competency, relevancy, materiality, or admissibility of evidence for any purpose in this action;

b. The right to object on any ground to the use of WWE’s responses, or the subject matter thereof, in this or any other action; and

c. The right, at any time, to revise, correct, supplement, clarify, and/or amend any response furnished.

3. WWE provides these Responses based on its interpretation and understanding of each Request. WWE reserves its right to amend and/or supplement its objections and responses in the event that Plaintiff asserts an interpretation that differs from WWE’s interpretation.

4. If discovery opens, WWE will produce responsive documents, if any, that are located after a reasonably diligent search of documents within WWE’s possession, custody, or control, taking into account the many potential sources of information arguably responsive to the Requests and the proportionality of the information sought relative to the burden of its production.

5. WWE objects to the Requests to the extent that they seek documents that are outside

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1 WWE's possession, custody, or control. WWE further objects to the Requests to the extent that
 2 they seek information that Plaintiff equally may otherwise obtain from public sources or, with less
 3 burden or expense, by using other means of discovery.

4 6. WWE objects to the Requests as overly broad and unduly burdensome to the extent
 5 that any Request purports to seek information relating to "all" or "any" documents,
 6 communications, emails, etc. that are responsive to the subject matter of a particular Request.

7 7. A response indicating the WWE will produce documents that are responsive to a
 8 Request is not a representation or statement of belief that any such documents exist or have existed.

9 8. Insofar as the Requests define "A&E" to include "A&E Networks and its corporate
 10 parent, subsidiaries, divisions, departments, affiliates, member firms, assigns, predecessors,
 11 successors, officers, directors, board members, employees, agents, representatives, partners,
 12 contractors and anyone else acting on A&E Networks' behalf," WWE objects to the Requests as
 13 vague, ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW
 14 regarding this definition.

15 9. Insofar as the Requests define "AEW" to include "All Elite Wrestling, LLC and its
 16 corporate parent, subsidiaries, divisions, departments, affiliates, member firms, assigns,
 17 predecessors, successors, officers, directors, board members, employees, agents, representatives,
 18 partners, contractors and anyone else acting on All Elite Wrestling, LLC's behalf," WWE objects
 19 to the Requests as vague, ambiguous, overly broad and unduly burdensome. WWE will meet and
 20 confer with MLW regarding this definition.

21 10. Insofar as the Requests define "FITE" to include "the New York-based streaming
 22 service owned by Triller Media, and its corporate parent, subsidiaries, divisions, departments,
 23 affiliates, member firms, assigns, predecessors, successors, officers, directors, board members,
 24 employees, agents, representatives, partners, contractors and anyone else acting on FITE's behalf,"
 25 WWE objects to the Requests as vague, ambiguous, overly broad and unduly burdensome. WWE
 26 will meet and confer with MLW regarding this definition.

27 11. Insofar as the Requests define "Fox" to include "Fox Corporation and its corporate
 28 parent, subsidiaries, divisions, departments, affiliates, member firms, assigns, predecessors,

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1 successors, officers, directors, board members, employees, agents, representatives, partners,
2 contractors and anyone else acting on Fox Corporation's behalf," WWE objects to the Requests as
3 vague, ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW
4 regarding this definition.

5 12. Insofar as the Requests define "Impact" to include "Anthem Wrestling Exhibitions,
6 LLC and its corporate parent, subsidiaries, divisions, departments, affiliates, member firms,
7 assigns, predecessors, successors, officers, directors, board members, employees, agents,
8 representatives, partners, contractors and anyone else acting on Anthem Wrestling Exhibitions,
9 LLC's behalf including, but not limited to, Total Nonstop Action Wrestling, TNA Entertainment
10 LLC, Aroluxe Media, LLC and Impact Ventures LLC," WWE objects to the Requests as vague,
11 ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW
12 regarding this definition.

13 13. Insofar as the Requests define "MSG" to include "Madison Square Garden Sports
14 Corp. and its corporate parent, subsidiaries, divisions, departments, affiliates, member firms,
15 assigns, predecessors, successors, officers, directors, board members, employees, agents,
16 representatives, partners, contractors and anyone else acting on MSG's behalf, including Madison
17 Square Garden Entertainment," WWE objects to the Requests as vague, ambiguous, overly broad
18 and unduly burdensome. WWE will meet and confer with MLW regarding this definition.

19 14. Insofar as the Requests define "New Japan Pro-Wrestling" to include "New Japan
20 Pro-Wrestling of America, Inc., the US-based Japanese wrestling promotion, and its corporate
21 parent, subsidiaries, divisions, departments, affiliates, member firms, assigns, predecessors,
22 successors, officers, directors, board members, employees, agents, representatives, partners,
23 contractors and anyone else acting on its behalf," WWE objects to the Requests as vague,
24 ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW
25 regarding this definition.

26 15. Insofar as the Requests define "Ring of Honor" to include "ROH Acquisitions Co.,
27 LLC, the wrestling production company, and its corporate parent, subsidiaries, divisions,
28 departments, affiliates, member firms, assigns, predecessors, successors, officers, directors, board

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members, employees, agents, representatives, partners, contractors and anyone else acting on its behalf,” WWE objects to the Requests as vague, ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW regarding this definition.

16. Insofar as the Requests define “Tubi” to include “Tubi, the California-based streaming service owned by a major media company Fox Corporation, and its corporate parent, subsidiaries, divisions, departments, affiliates, member firms, assigns, predecessors, successors, officers, directors, board members, employees, agents, representatives, partners, contractors and anyone else acting on its behalf,” WWE objects to the Requests as vague, ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW regarding this definition.

17. Insofar as the Requests define “Vice” to include “VICE TV and its corporate parent, subsidiaries, divisions, departments, affiliates, member firms, assigns, predecessors, successors, officers, directors, board members, employees, agents, representatives, partners, contractors and anyone else acting on VICE TV’s behalf,” WWE objects to the Requests as vague, ambiguous, overly broad and unduly burdensome. WWE will meet and confer with MLW regarding this definition.

18. Insofar as the Requests define “WWE,” “You,” or “Your” to include “any parents, subsidiaries, divisions, affiliates, predecessors, successors, and assigns, and all of Defendants’ current and former officers, directors, owners, shareholders, employees, contractors, agents, attorneys and representatives,” WWE objects to the Requests as vague, ambiguous, overly broad and unduly burdensome. WWE will construe the term “WWE” to mean solely the Defendant indicated in the particular Request and no other person or entity.

19. WWE incorporates the foregoing paragraphs of this Preliminary Statement into each and every one of its Responses to the Requests set forth below.

SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS

REQUEST FOR PRODUCTION NO. 1:

All documents related to MLW, including, but not limited to, the following: (a) communications that refer to, discuss or constitute your efforts to recruit performers who are under contract with MLW; (b) communications between you and Tubi, Vice and/or FITE that reference

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1 MLW or its programs; (c) internal communications that reference MLW or its programs; (d)
 2 communications that refer to, discuss or constitute your efforts to discourage businesses or
 3 performers from working with MLW; (e) documents that refer to or discuss MLW contracts, or
 4 proposed or prospective contracts, with cable, broadcast, streaming or other media outlets,
 5 including Tubi, Vice and FITE; and (f) documents related to Court Bauer.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

7 WWE objects to Request No. 1 as premature because discovery is not yet open in this case,
 8 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 9 No. 1 to the extent that it calls for the production of documents unrelated to this matter, is overbroad
 10 and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are
 11 not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s
 12 claim or defense in this case and not proportional to the needs of the case. WWE further objects to
 13 Request No. 1 to the extent it mischaracterizes WWE’s actions and/or correspondence as
 14 “discouraging business or performers”. WWE further objects to the extent that Request No. 1 seeks
 15 documents that are protected by the attorney-client privilege, work product doctrine, the joint
 16 defense privilege and/or any other applicable privilege or protection.

17 Subject to and without waiving the foregoing objections, WWE states that it will not
 18 produce any responsive documents regarding Request No. 1 until discovery is open and a protective
 19 order and ESI protocols have been implemented. Once these are implemented and discovery opens,
 20 WWE will search for and produce relevant, responsive, non-privileged information based on agreed
 21 upon search terms.

22 **REQUEST FOR PRODUCTION NO. 2:**

23 All documents related to AEW, including, but not limited to, the following: (a)
 24 communications that refer to, discuss or constitute your efforts to recruit performers who are under
 25 contract with AEW; (b) communications between you and third parties that reference AEW or its
 26 programs; (c) internal communications that reference AEW or its programs; (d) communications
 27 that refer to, discuss or constitute your efforts to discourage businesses or performers from working
 28 with AEW; (e) documents that refer to or discuss AEW contracts, or proposed or prospective

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contracts, with cable, broadcast, streaming or other media outlets; (f) documents concerning AEW's, booking of, or attempt to book, Heritage Bank Center (formerly known as U.S. Bank Arena) for events, including communications with Heritage Bank Center concerning third-party bookings of Heritage Bank Center.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

WWE objects to Request No. 2 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 2 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and is not proportional to the needs of the case. WWE further objects to Request No. 2 to the extent it mischaracterizes WWE's actions and/or correspondence as "discouraging business or performers." WWE further objects to the extent that Request No. 2 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that it will not produce any responsive documents regarding Request No. 2 until discovery is open and a protective order and ESI protocols have been implemented. Once these are implemented and discovery opens, WWE will search for and produce relevant, responsive, non-privileged information based on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 3:

All documents related to Impact, including, but not limited to, the following: (a) communications that refer to, discuss or constitute your efforts to recruit performers who are under contract with Impact; (b) communications between you and third parties that reference Impact or its programs; (c) internal communications that reference Impact or its programs; (d) communications that refer to, discuss or constitute your efforts to discourage businesses or performers from working with Impact; (e) documents that refer to or discuss Impact contracts, or proposed or prospective contracts, with cable, broadcast, streaming or other media outlets.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

WWE objects to Request No. 3 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 3 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague, and is not proportional to the needs of the case. WWE further objects to Request No. 3 to the extent it is misleading and mischaracterizes WWE's actions and/or correspondence as "discouraging business or performers". WWE further objects to the extent that Request No. 3 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that it will not produce any responsive documents regarding Request No. 3 until discovery is open and a protective order and ESI protocols have been implemented. Once these are implemented and discovery opens, WWE will search for and produce relevant, responsive, non-privileged information based on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 4:

All documents related to MLW's negotiations or relationship with VICE, including, but not limited to, communications between you and VICE that reference MLW or its programs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

WWE objects to Request No. 4 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 4 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party's claim or defense in this case and not proportional to the needs of the case. WWE further objects to Request No. 4 to the extent that it seeks documents that MLW already possesses or to which MLW has equal access, and therefore are equally or less burdensome for Plaintiff to procure for itself. WWE further objects to Request No. 4 to the extent it is duplicative of Request No. 1. WWE further objects to the extent that Request No. 4 seeks documents that are protected by the

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1 attorney-client privilege, work product doctrine, the joint defense privilege and/or any other
2 applicable privilege or protection.

3 Subject to and without waiving the foregoing objections, WWE states that it will not
4 produce any responsive documents regarding Request No. 4 until discovery is open and a protective
5 order and ESI protocols have been implemented. Once these are implemented and discovery opens,
6 WWE will search for and produce relevant, responsive, non-privileged information based on agreed
7 upon search terms.

8 **REQUEST FOR PRODUCTION NO. 5:**

9 All documents related to WWE's involvement with VICE's "Dark Side of the Ring
10 Program," including documents related to Jerry McDevitt's appearance on the show.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

12 WWE objects to Request No. 5 as premature because discovery is not yet open in this case,
13 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
14 No. 5 to the extent that it calls for the production of documents unrelated to this matter, is overbroad
15 and unduly burdensome, is vague in its request for "all" documents, and is not proportional to the
16 needs of the case. WWE further objects to Request No. 5 to the extent it is duplicative of Request
17 No. 4. WWE further objects to the extent that Request No. 5 seeks documents that are protected by
18 the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other
19 applicable privilege or protection.

20 WWE further objects to Request No. 5 as seeking information not related to any of MLW's
21 asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible
22 evidence.

23 WWE will not produce materials responsive to Request No. 5.

24 **REQUEST FOR PRODUCTION NO. 6:**

25 All documents related to Tubi, including, but not limited to, communications between you
26 and VICE [*sic*] that reference MLW or its programs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

WWE interprets “VICE” in Request No. 6 to be a typographical error, and to refer to Tubi. WWE objects to Request No. 6 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 6 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to Request No. 6 to the extent it is duplicative of Request No. 1. WWE further objects to the extent that Request No. 6 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that it will not produce any responsive documents regarding Request No. 6 until discovery is open and a protective order and ESI protocols have been implemented. Once these are implemented and discovery opens, WWE will search for and produce relevant, responsive, non-privileged information based on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 7:

All documents related to FITE, including, but not limited to, communications between you and FITE that reference MLW or its programs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

WWE objects to Request No. 7 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 7 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to Request No. 7 to the extent it is duplicative of Request No. 1. WWE further objects to the extent

1 that Request No. 7 seeks documents that are protected by the attorney-client privilege, work product
2 doctrine, the joint defense privilege and/or any other applicable privilege or protection.

3 Subject to and without waiving the foregoing objections, WWE states that it will not
4 produce any responsive documents regarding Request No. 7 until discovery is open and a protective
5 order and ESI protocols have been implemented. Once these are implemented and discovery opens,
6 WWE will search for and produce relevant, responsive, non-privileged information based on agreed
7 upon search terms.

8 **REQUEST FOR PRODUCTION NO. 8:**

9 From January 1, 2018 until December 31, 2018, all documents related to New Japan Pro-
10 Wrestling, including, but not limited to, documents relating to New Japan Pro-Wrestling's booking
11 of, or attempt to book, Madison Square Garden for events, including communications with MSG
12 concerning third-party bookings of MSG venues.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

14 WWE objects to Request No. 8 as premature because discovery is not yet open in this case,
15 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
16 No. 8 to the extent that it calls for the production of documents unrelated to this matter, is overbroad
17 and unduly burdensome, is vague in its request for "all" documents, and is not proportional to the
18 needs of the case. WWE further objects to Request No. 8 to the extent that it seeks documents
19 outside the possession, custody, and/or control of WWE or to which MLW has equal access, and
20 therefore are equally or less burdensome for Plaintiff to procure for itself. WWE further objects to
21 the extent that Request No. 8 seeks documents that are protected by the attorney-client privilege,
22 work product doctrine, the joint defense privilege and/or any other applicable privilege or
23 protection. WWE further objects to Request No. 8 as seeking information not related to any of
24 MLW's asserted claims and not reasonably calculated to lead to the discovery of relevant,
25 admissible evidence.

26 WWE will not produce materials responsive to Request No. 8.
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REQUEST FOR PRODUCTION NO. 9:

From January 1, 2018 until December 31, 2018, all documents related to Ring of Honor, including, but not limited to, documents relating to Ring of Honor's booking of, or attempt to book, Madison Square Garden for events, including communications with MSG concerning third-party bookings of MSG venues.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

WWE objects to Request No. 9 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 9 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party's claim or defense in this case and not proportional to the needs of the case. WWE further objects to the extent that Request No. 9 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection. WWE further objects to Request No. 9 as seeking information not related to any of MLW's asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

WWE will not produce materials responsive to Request No. 9.

REQUEST FOR PRODUCTION NO. 10:

All documents and communications with Fox regarding (a) Tubi and/or (b) MLW.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

WWE objects to Request No. 10 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 10 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents that are not relevant to any party's claim or defense in this case and not proportional to the needs of the case. WWE objects to Request No. 10 to the extent it is duplicative of Request No. 1. WWE further objects to the extent that Request No. 10 seeks documents that are protected by the attorney-

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1 client privilege, work product doctrine, the joint defense privilege and/or any other applicable
2 privilege or protection.

3 Subject to and without waiving the foregoing objections, WWE states that it will not
4 produce any responsive documents regarding Request No. 10 until discovery is open and a
5 protective order and ESI protocols have been implemented. Once these are implemented and
6 discovery opens, WWE will search for and produce responsive, non-privileged information based
7 on agreed upon search terms.

8 **REQUEST FOR PRODUCTION NO. 11:**

9 Documents sufficient to identify each person who has knowledge of communications
10 between WWE and VICE that occurred during the time period January 1, 2021 through December
11 31, 2021 concerning MLW or MLW's negotiations with VICE.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

13 WWE objects to Request No. 11 as premature because discovery is not yet open in this case,
14 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
15 No. 11 to the extent that it calls for the production of documents unrelated to this matter, is
16 overbroad and unduly burdensome, is vague, and seeks documents that are not reasonably
17 calculated to lead to the discovery of admissible evidence relevant to any party's claim or defense
18 in this case and not proportional to the needs of the case. WWE further objects to Request No. 11
19 to the extent it mischaracterizes the discussions between MLW and VICE. WWE further objects
20 to Request No. 11 to the extent it is duplicative of Request No. 1. WWE further objects to the extent
21 that Request No. 11 seeks documents that are protected by the attorney-client privilege, work
22 product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

23 Subject to and without waiving the foregoing objections, WWE states that it will not
24 produce any responsive documents regarding Request No. 11 until discovery is open and a
25 protective order and ESI protocols have been implemented. Once these are implemented and
26 discovery opens, WWE will search for and produce responsive, non-privileged information based
27 on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 12:

Documents sufficient to identify each person who has knowledge of communications between WWE and Tubi that occurred during the time period May 1, 2021 through December 31, 2021 concerning MLW or MLW's negotiations or agreement with Tubi.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

WWE objects to Request No. 12 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 12 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party's claim or defense in this case and not proportional to the needs of the case. WWE further objects to Request No. 12 to the extent it mischaracterizes the discussions and/or obligations between MLW and Tubi. WWE further objects to Request No. 12 to the extent it is duplicative of Request No. 1. WWE further objects to the extent that Request No. 12 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that it will not produce any responsive documents regarding Request No. 12 until discovery is open and a protective order and ESI protocols have been implemented. Once these are implemented and discovery opens, WWE will search for and produce responsive, non-privileged information based on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 13:

Documents sufficient to identify each person who has knowledge of communications between WWE and FITE that occurred during the time period January 1, 2021 through December 31, 2021 concerning MLW or MLW's negotiations with FITE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

WWE objects to Request No. 13 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 13 to the extent that it calls for the production of documents unrelated to this matter, is

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1 overbroad and unduly burdensome, is vague, and seeks documents that are not reasonably
 2 calculated to lead to the discovery of admissible evidence relevant to any party's claim or defense
 3 in this case and not proportional to the needs of the case. WWE further objects to Request No. 13
 4 to the extent it mischaracterizes the discussions between MLW and FITE. WWE further objects to
 5 Request No. 13 to the extent it is duplicative of Request No. 1. WWE further objects to the extent
 6 that Request No. 13 seeks documents that are protected by the attorney-client privilege, work
 7 product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

8 Subject to and without waiving the foregoing objections, WWE states that it will not
 9 produce any responsive documents regarding Request No. 13 until discovery is open and a
 10 protective order and ESI protocols have been implemented. Once these are implemented and
 11 discovery opens, WWE will search for and produce responsive, non-privileged information based
 12 on agreed upon search terms.

13 **REQUEST FOR PRODUCTION NO. 14:**

14 All documents related to WWE's efforts to source, locate or hire professional wrestlers,
 15 including, but not limited to, WWE's efforts to source, locate or hire professional wrestlers from
 16 competitors.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

18 WWE objects to Request No. 14 as premature because discovery is not yet open in this case,
 19 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 20 No. 14 to the extent that it calls for the production of documents unrelated to this matter, is vague
 21 in its request for "all" documents, and is not proportional to the needs of the case. WWE further
 22 objects to Request No. 14 to the extent it mischaracterizes WWE's actions and/or correspondence
 23 to "locate or hire professional wrestlers from competitors." WWE further objects to the extent that
 24 Request No. 14 seeks documents that are protected by the attorney-client privilege, work product
 25 doctrine, the joint defense privilege and/or any other applicable privilege or protection.

26 WWE further objects to Request No. 14 as seeking information not related to any of MLW's
 27 asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible
 28 evidence. Specifically, MLW's four counts concern its negotiations and purported contracts with

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1 television and streaming outlets. MLW has not connected those claims to or alleged separate claims
 2 related to WWE's efforts to "source, locate, or hire" professional wrestlers from MLW or any other
 3 business. Even if such connection were possible (it is not), Request No. 14 is overbroad and unduly
 4 burdensome. MLW appears to seek documents regarding every single individual WWE has ever
 5 considered as a professional wrestler, even if those individuals had no relationship with MLW and
 6 would never have one. That number extends well into the thousands or tens of thousands.

7 WWE will not produce materials responsive to Request No. 14.

8 **REQUEST FOR PRODUCTION NO. 15:**

9 The contracts or employment agreements of all WWE professional wrestlers whose
 10 contracts contain non-compete clauses or other clauses that limit or restrict the performer's
 11 alternative employment options.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

13 WWE objects to Request No. 15 as premature because discovery is not yet open in this case,
 14 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 15 No. 15 to the extent that it calls for the production of documents unrelated to this matter, is vague
 16 in its request for "all" documents, and is not proportional to the needs of the case. WWE further
 17 objects to Request No. 15 to the extent it mischaracterizes professional wrestlers as employees and
 18 mischaracterizes contracts containing "non-compete clauses or other clauses" as "limit[ing] or
 19 restrict[ing] the performer's "alternative employment options." WWE further objects to the extent
 20 that Request No. 15 seeks documents that are protected by the attorney-client privilege, work
 21 product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

22 WWE further objects to Request No. 15 as seeking information not related to any of MLW's
 23 asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible
 24 evidence. Specifically, MLW's four counts concern its negotiations and purported contracts with
 25 television and streaming outlets. MLW has not connected those claims to or alleged separate claims
 26 related to WWE's contracts with professional wrestlers.

27 WWE further objects to Request No. 15 as overbroad and unduly burdensome, As written,
 28 MLW seeks all versions of WWE talent contracts, including non-executed, draft contracts, as well

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1 as those protected by attorney-client privilege and the work product doctrine. WWE's agreements
2 contain standard clauses which are applicable to all WWE wrestlers. As such, a request for "all"
3 such agreements is not only unduly burdensome because it is duplicative but costly.

4 WWE will not produce materials responsive to Request No. 15.

5 **REQUEST FOR PRODUCTION NO. 16:**

6 All documents related to the performance of WWE or any of its employees or contractors
7 in connection with professional wrestling events, including documents containing analyses,
8 reviews, evaluations, appraisals or other internal assessments related to the quality, value or
9 completeness of, or defects in, each such person's work; their knowledge, skills and qualifications;
10 and warnings, criticisms, reprimands, demotions, reassignments, terminations or other disciplinary
11 actions related to those individuals, as well as documents sufficient to show which WWE
12 professional wrestlers participated in WWE's events.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

14 WWE objects to Request No. 16 as premature because discovery is not yet open in this case,
15 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
16 No. 16 to the extent that it calls for the production of documents unrelated to this matter, is vague
17 in its request for "all" documents, and is not proportional to the needs of the case. WWE further
18 objects to the extent that Request No. 16 seeks documents that are protected by the attorney-client
19 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
20 or protection. WWE further objects to Request No. 16 as seeking information not related to any of
21 MLW's asserted claims and not reasonably calculated to lead to the discovery of relevant,
22 admissible evidence.

23 WWE further objects to Request No. 16 as overbroad and unduly burdensome. As written,
24 MLW seeks performance evaluations for all WWE employees and contractors. The burden of
25 reviewing and producing such material far exceeds any potential probative value.

1 WWE will not produce materials responsive to Request No. 16.

2 **REQUEST FOR PRODUCTION NO. 17:**

3 All documents concerning the termination of the employment, or the resignation, of any
4 professional wrestler during the time period January 1, 2020 through present.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

6 WWE objects to Request No. 17 as premature because discovery is not yet open in this case,
7 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
8 No. 17 to the extent that it calls for the production of documents unrelated to this matter, is
9 overbroad and unduly burdensome, is vague in its request for “all” documents, and is not
10 proportional to the needs of the case. WWE further objects to the extent that Request No. 17 seeks
11 documents that are protected by the attorney-client privilege, work product doctrine, the joint
12 defense privilege and/or any other applicable privilege or protection. WWE further objects to
13 Request No. 17 as seeking information not related to any of MLW’s asserted claims and not
14 reasonably calculated to lead to the discovery of relevant, admissible evidence.

15 WWE will not produce materials responsive to Request No. 17.

16 **REQUEST FOR PRODUCTION NO. 18:**

17 All documents, including organizational and staffing charts, related to the organization,
18 areas of responsibility and reporting relationships of WWE, including, but not limited to,
19 organizational charts reflecting the name, position and hierarchy of employees with any
20 responsibilities relating to the production of professional wrestling content.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

22 WWE objects to Request No. 18 as premature because discovery is not yet open in this case,
23 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
24 No. 18 to the extent that it calls for the production of documents unrelated to this matter, is
25 overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents
26 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
27 party’s claim or defense in this case and not proportional to the needs of the case. Specifically,
28 WWE employs and contracts with thousands of individuals globally across a wide range of

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1 departments, including merchandise sales, investor relations, accounting, and studio personnel, to
 2 name a few. WWE further objects to the extent that Request No. 18 seeks documents that are
 3 protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or
 4 any other applicable privilege or protection.

5 Subject to and without waiving the foregoing objections, WWE states that it will not
 6 produce any responsive documents regarding Request No. 18 until discovery is open and a
 7 protective order and ESI protocols have been implemented. Once these are implemented and
 8 discovery opens, WWE will search for and produce responsive, non-privileged information based
 9 on agreed upon search terms.

10 **REQUEST FOR PRODUCTION NO. 19:**

11 All documents related to WWE's outreach, solicitation or hiring of former MLW
 12 professional wrestler Stephon Strickland ("Strickland"), who performs under the ring names
 13 Swerve Strickland or Isaiah Swerve Scott, including internal communications concerning WWE's
 14 decision to hire Strickland; Strickland's potential role in the dispute between the parties or litigation
 15 between MLW and WWE; and communications with Strickland.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

17 WWE objects to Request No. 19 as premature because discovery is not yet open in this case,
 18 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 19 No. 19 to the extent that it calls for the production of documents unrelated to this matter, is
 20 overbroad and unduly burdensome, is vague in its request for "all" documents, and is not
 21 proportional to the needs of the case. WWE further objects to the extent that Request No. 19 seeks
 22 documents that are protected by the attorney-client privilege, work product doctrine, the joint
 23 defense privilege and/or any other applicable privilege or protection. WWE further objects to
 24 Request No. 19 as seeking information not related to any of MLW's asserted claims and not
 25 reasonably calculated to lead to the discovery of relevant, admissible evidence.

26 WWE will not produce materials responsive to Request No. 19.
 27
 28

REQUEST FOR PRODUCTION NO. 20:

All documents related to WWE's outreach, solicitation or hiring of former MLW professional wrestler Luis Alberto Medina ("Medina"), who performs under the ring name Gino Medina, including internal communications concerning WWE's solicitation of Medina, any WWE events, programs or promotions that Medina appeared in, and any communications with Medina.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

WWE objects to Request No. 20 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 20 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and is not proportional to the needs of the case. WWE further objects to the extent that Request No. 20 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection. WWE further objects to Request No. 20 as seeking information not related to any of MLW's asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

WWE will not produce materials responsive to Request No. 20.

REQUEST FOR PRODUCTION NO. 21:

All documents related to WWE's outreach, solicitation or hiring of former MLW professional wrestler Harry Smith ("Smith"), who performs under the ring name Davey Boy Smith Jr., including internal communications concerning WWE's solicitation of Smith, any WWE events, programs or promotions that Smith appeared in, and any communications with Smith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

WWE objects to Request No. 21 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 21 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and is not proportional to the needs of the case. WWE further objects to the extent that Request No. 21 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint

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1 defense privilege and/or any other applicable privilege or protection. WWE further objects to
 2 Request No. 21 as seeking information not related to any of MLW's asserted claims and not
 3 reasonably calculated to lead to the discovery of relevant, admissible evidence.

4 WWE will not produce materials responsive to Request No. 21

5 **REQUEST FOR PRODUCTION NO. 22:**

6 All documents related to WWE's outreach, solicitation or hiring of former MLW
 7 professional wrestler Jacob Fuavaifatu ("Fuavaifatu"), who performs under the ring name Jacob
 8 Fatu, including internal communications concerning WWE's solicitation of Fuavaifatu, any WWE
 9 events, programs or promotions that Fuavaifatu appeared in, and any communications with
 10 Fuavaifatu.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

12 WWE objects to Request No. 22 as premature because discovery is not yet open in this case,
 13 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 14 No. 22 to the extent that it calls for the production of documents unrelated to this matter, is
 15 overbroad and unduly burdensome, is vague in its request for "all" documents, and is not
 16 proportional to the needs of the case. WWE further objects to the extent that Request No. 22 seeks
 17 documents that are protected by the attorney-client privilege, work product doctrine, the joint
 18 defense privilege and/or any other applicable privilege or protection. WWE further objects to
 19 Request No. 22 as seeking information not related to any of MLW's asserted claims and not
 20 reasonably calculated to lead to the discovery of relevant, admissible evidence.

21 WWE will not produce materials responsive to Request No. 22.

22 **REQUEST FOR PRODUCTION NO. 23:**

23 All documents related to WWE's outreach, solicitation or hiring of former MLW
 24 professional wrestler Lance Anoa'i ("Anoa'i"), including internal communications concerning
 25 WWE's solicitation of Anoa'i, any WWE events, programs or promotions that Anoa'i appeared in,
 26 and any communications with Anoa'i.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

WWE objects to Request No. 23 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 23 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and is not proportional to the needs of the case. WWE further objects to the extent that Request No. 23 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection. WWE further objects to Request No. 23 as seeking information not related to any of MLW’s asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

WWE will not produce materials responsive to Request No. 23.

REQUEST FOR PRODUCTION NO. 24:

From January 1, 2012 through the present, all lawsuits, claims, or complaints, threatened or actual, made by any third party relating to allegations that WWE wrongfully poached or solicited employees or contractors, or tortiously or unfairly interfered with a competitor’s business, including a copy of any transcript of testimony given in connection with such lawsuits, claims, or complaints.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

WWE objects to Request No. 24 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 24 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all”, and is not proportional to the needs of the case. WWE further objects to Request No. 24 to the extent it mischaracterizes any and all legal actions, claims, or complaints and/or WWE’s correspondence and/or conduct as “threaten[ing],” or that WWE “wrongfully poached or solicited” or “tortiously or unfairly interfered with a competitor.” WWE further objects to the extent that Request No. 24 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege, court protective orders, and/or any other applicable privilege or protection. WWE further objects

1 to Request No. 24 as seeking information not related to any of MLW's asserted claims and not
2 reasonably calculated to lead to the discovery of relevant, admissible evidence.

3 WWE will not produce materials responsive to Request No. 24.

4 **REQUEST FOR PRODUCTION NO. 25:**

5 All lawsuits, claims, or complaints, threatened or actual, made by WWE's employees in
6 connection with WWE's employment or contractor agreements, including claims or complaints
7 related to the hiring or retention of WWE's employees, contractors or agents, including a copy of
8 any transcript of testimony given in connection with such lawsuits, claims, or complaints.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

10 WWE objects to Request No. 25 as premature because discovery is not yet open in this case,
11 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
12 No. 25 to the extent that it calls for the production of documents unrelated to this matter, is
13 overbroad and unduly burdensome, is vague in its request for "all" documents, and is not
14 proportional to the needs of the case. WWE further objects to the extent that Request No. 25 seeks
15 documents that are protected by the attorney-client privilege, work product doctrine, the joint
16 defense privilege, court protective orders, and/or any other applicable privilege or protection. WWE
17 further objects to Request No. 25 as seeking information not related to any of MLW's asserted
18 claims and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

19 WWE will not produce materials responsive to Request No. 25.

20 **REQUEST FOR PRODUCTION NO. 26:**

21 All documents relating to WWE's efforts to prevent competitors from booking arenas or
22 venues for the production of professional wrestling content, including, but not limited to, WWE's
23 efforts to book arenas or venues during times when competitors sought to book such arenas or
24 venues and communications with event venues, stadiums or arenas concerning third parties'
25 booking of, or attempt to book, such event venues, stadiums or arenas for events.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

27 WWE objects to Request No. 26 as premature because discovery is not yet open in this case,
28 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request

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No. 26 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and is not proportional to the needs of the case. WWE further objects to Request No. 26 to the extent it mischaracterizes WWE’s actions and/or correspondences as “efforts to prevent competitors” from “booking arena or venues.” WWE further objects to the extent that Request No. 26 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection. WWE further objects to Request No. 26 as seeking information not related to any of MLW’s asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

Subject to and without waiving the foregoing objections, WWE states that it will not produce any responsive documents regarding Request No. 26 until discovery is open and a protective order and ESI protocols have been implemented. Once these are implemented and discovery opens, WWE will search for and produce relevant, responsive, non-privileged information based on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 27:

All documents concerning the internal decision making related to when WWE programming is broadcast or streamed, which networks or platforms stream such programming, and whether to air programming in timeslots that compete with competitors, including, but not limited to, internal analyses, forecasts or projections.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

WWE objects to Request No. 27 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 27 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to the extent that Request No. 27 seeks documents that are protected by the attorney-client

1 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
2 or protection.

3 Subject to and without waiving the foregoing objections, WWE states that it will not
4 produce any responsive documents regarding Request No. 27 until discovery is open and a
5 protective order and ESI protocols have been implemented. Once these are implemented and
6 discovery opens, WWE will search for and produce relevant, responsive, non-privileged
7 information based on agreed upon search terms.

8 **REQUEST FOR PRODUCTION NO. 28:**

9 All documents concerning the internal decision making related to WWE's decision to air
10 Clash at The Castle on Saturday, September 3, 2022 and NXT Worlds Collide on September 4,
11 2022.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

13 WWE objects to Request No. 28 as premature because discovery is not yet open in this case,
14 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
15 No. 28 to the extent that it calls for the production of documents unrelated to this matter, is
16 overbroad and unduly burdensome, is vague in its request for "all" documents, and is not
17 proportional to the needs of the case. MLW has failed to assert any facts in the operative complaint
18 relative to its claims, to support such a broad request for documents concerning its broadcasted
19 promotional events. WWE further objects to the extent that Request No. 28 seeks documents that
20 are protected by the attorney-client privilege, work product doctrine, the joint defense privilege
21 and/or any other applicable privilege or protection. WWE further objects to Request No. 26 as
22 seeking information not related to any of MLW's asserted claims and not reasonably calculated to
23 lead to the discovery of relevant, admissible evidence.

24 WWE will not produce materials responsive to Request No. 28.

25 **REQUEST FOR PRODUCTION NO. 29:**

26 All documents related to WWE's agreements for the distribution, licensing fees, rights fees,
27 advertising revenue, or subscription revenue of WWE professional wrestling content, including,
28 but not limited to agreements for the licensing or distribution of *Smackdown*, *RAW* or *NXT*

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1 programming, including documents and communications concerning negotiations with counter-
2 parties.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

4 WWE objects to Request No. 29 as premature because discovery is not yet open in this case,
5 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
6 No. 29 to the extent that it calls for the production of documents unrelated to this matter, is
7 overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents
8 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
9 party’s claim or defense in this case and not proportional to the needs of the case. WWE further
10 objects to the extent that Request No. 29 seeks documents that are protected by the attorney-client
11 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
12 or protection.

13 Subject to and without waiving the foregoing objections, WWE states that it will not
14 produce any responsive documents regarding Request No. 29 until discovery is open and a
15 protective order and ESI protocols have been implemented. Once these are implemented and
16 discovery opens, WWE will search for and produce relevant, responsive, non-privileged
17 information based on agreed upon search terms.

18 **REQUEST FOR PRODUCTION NO. 30:**

19 All documents relating to the pricing of WWE events, including but not limited to: (a)
20 analyses concerning the initial pricing for the sale or licensing of WWE events to cable, broadcast
21 or streaming platforms; (b) actual or potential price increases or decreases, including any such
22 changes in response to competition from another product; (c) rebates, discounts, or markdowns,
23 including the negotiation thereof; or (d) negotiations with cable, broadcast or streaming platform.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

25 WWE objects to Request No. 30 as premature because discovery is not yet open in this case,
26 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
27 No. 30 to the extent that it calls for the production of documents unrelated to this matter, is
28 overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents

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1 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
 2 party's claim or defense in this case and not proportional to the needs of the case. WWE further
 3 objects to the extent that Request No. 30 seeks documents that are protected by the attorney-client
 4 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
 5 or protection.

6 Subject to and without waiving the foregoing objections, WWE states that it will not
 7 produce any responsive documents regarding Request No. 30 until discovery is open and a
 8 protective order and ESI protocols have been implemented. Once these are implemented and
 9 discovery opens, WWE will search for and produce relevant, responsive, non-privileged
 10 information based on agreed upon search terms.

11 **REQUEST FOR PRODUCTION NO. 31:**

12 All documents relating to: (a) competition to WWE, including but not limited to competition
 13 from MLW, AEW or Impact; or (b) analyses, forecasts or other projections reflecting sales of WWE
 14 programming, MLW programming, AEW programming or Impact programming, or any other
 15 competition to WWE programming.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

17 WWE objects to Request No. 31 as premature because discovery is not yet open in this case,
 18 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 19 No. 31 to the extent that it calls for the production of documents unrelated to this matter, is
 20 overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents
 21 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
 22 party's claim or defense in this case and not proportional to the needs of the case. WWE further
 23 objects to Request No. 31 to the extent that it seeks documents outside the possession, custody,
 24 and/or control of WWE or to which MLW has equal access, and therefore are equally or less
 25 burdensome for Plaintiff to procure for itself. WWE further objects to the extent that Request No.
 26 31 seeks documents that are protected by the attorney-client privilege, work product doctrine, the
 27 joint defense privilege and/or any other applicable privilege or protection.

1 Subject to and without waiving the foregoing objections, WWE states that it will not
 2 produce any responsive documents regarding Request No. 31 until discovery is open and a
 3 protective order and ESI protocols have been implemented. Once these are implemented and
 4 discovery opens, WWE will search for and produce relevant, responsive, non-privileged
 5 information based on agreed upon search terms.

6 **REQUEST FOR PRODUCTION NO. 32:**

7 All documents concerning WWE's decision to shut down or discontinue its streaming
 8 service, WWE Network.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

10 WWE objects to Request No. 32 as premature because discovery is not yet open in this case,
 11 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 12 No. 32 to the extent that it calls for the production of documents unrelated to this matter, is
 13 overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents
 14 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
 15 party's claim or defense in this case and not proportional to the needs of the case. WWE further
 16 objects to the extent that Request No. 32 seeks documents that are protected by the attorney-client
 17 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
 18 or protection.

19 Subject to and without waiving the foregoing objections, WWE states that its streaming
 20 service, WWE Network, was not "shut down" or "discontinued," and it continues to operate.
 21 Accordingly, there are no documents to produce in response to Request No. 32.

22 **REQUEST FOR PRODUCTION NO. 33:**

23 All documents, including market studies or analyses, concerning WWE's target audience
 24 or viewership for professional wrestling content.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

26 WWE objects to Request No. 33 as premature because discovery is not yet open in this case,
 27 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 28 No. 33 to the extent that it calls for the production of documents unrelated to this matter, is

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1 overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents
 2 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
 3 party’s claim or defense in this case and not proportional to the needs of the case. WWE further
 4 objects to the extent that Request No. 33 seeks documents that are protected by the attorney-client
 5 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
 6 or protection.

7 Subject to and without waiving the foregoing objections, WWE states that it will not
 8 produce any responsive documents regarding Request No. 33 until discovery is open and a
 9 protective order and ESI protocols have been implemented. Once these are implemented and
 10 discovery opens, WWE will search for and produce relevant, responsive, non-privileged
 11 information based on agreed upon search terms.

12 **REQUEST FOR PRODUCTION NO. 34:**

13 On a monthly basis, all viewership or ratings data for professional wrestling content.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

15 WWE objects to Request No. 34 as premature because discovery is not yet open in this case,
 16 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 17 No. 34 to the extent that it calls for the production of documents unrelated to this matter, is
 18 overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents
 19 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
 20 party’s claim or defense in this case and not proportional to the needs of the case. WWE further
 21 objects to the extent that Request No. 34 seeks documents that are protected by the attorney-client
 22 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
 23 or protection.

24 Subject to and without waiving the foregoing objections, WWE states that the viewership
 25 data and ratings data for its televised professional wrestling content is publicly available. For non-
 26 publicly-available viewership data for WWE’s professional wrestling content, WWE states that it
 27 will not produce any responsive documents regarding Request No. 34 until discovery is open and
 28 a protective order and ESI protocols have been implemented. Once these are implemented and

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discovery opens, WWE will search for and produce responsive, non-privileged information based on agreed upon search terms.

REQUEST FOR PRODUCTION NO. 35:

All minutes or notes relating to meetings of Your Board of Directors, or any committee or subcommittee of the Board of Directors, from January 1, 2018 to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

WWE objects to Request No. 35 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 35 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to the extent that Request No. 35 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection. WWE further objects to Request No. 35 as overly broad and seeking information not related to any of MLW’s asserted claims and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

WWE will not produce materials responsive to Request 35.

REQUEST FOR PRODUCTION NO. 36:

All insurance policies, insuring agreements, declarations, binders, endorsements, and certificates of insurance concerning insurance coverage maintained by you concerning the damages sought in this Action.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

WWE objects to Request No. 36 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 36 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any

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1 party's claim or defense in this case and not proportional to the needs of the case. WWE further
 2 objects to the extent that Request No. 36 seeks documents that are protected by the attorney-client
 3 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
 4 or protection.

5 Subject to and without waiving the foregoing objections, WWE refers MLW to its initial
 6 disclosures and states that it is not a party to any insurance or indemnification agreement that is
 7 relevant to this action at this time. WWE states that it does not have any documents responsive to
 8 Request No. 36.

9 **REQUEST FOR PRODUCTION NO. 37:**

10 All claims made or forms submitted by you to insurance carriers in connection with any
 11 claims made the basis of this Action.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

13 WWE objects to Request No. 37 as premature because discovery is not yet open in this case,
 14 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 15 No. 37 to the extent that it calls for the production of documents unrelated to this matter, is
 16 overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents
 17 that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any
 18 party's claim or defense in this case and not proportional to the needs of the case. WWE further
 19 objects to the extent that Request No. 37 seeks documents that are protected by the attorney-client
 20 privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege
 21 or protection.

22 Subject to and without waiving the foregoing objections, WWE refers MLW to its initial
 23 disclosures and states that it is not a party to any insurance or indemnification agreement that is
 24 relevant to this action at this time. WWE does not have any documents responsive to Request No.
 25 37.

26 **REQUEST FOR PRODUCTION NO. 38:**

27 All documents related to any notification, claim or reservation of rights, made under any
 28 insurance policy, in connection with the Complaint.

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RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

WWE objects to Request No. 38 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 38 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to the extent that Request No. 38 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that it does not have any documents responsive to Request No. 38.

REQUEST FOR PRODUCTION NO. 39:

All documents concerning any settlement agreement, indemnity agreement, hold-harmless agreement, guaranty agreement, judgment sharing agreement, non-disclosure agreement, covenant not to sue, joint defense agreement, cooperation agreement, cost sharing agreement and common interest agreement between WWE and any other person in connection with this litigation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

WWE objects to Request No. 39 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 39 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to the extent that Request No. 39 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

1 Subject to and without waiving the foregoing objections, WWE states that it does not have
2 any documents responsive to Request No. 39.

3 **REQUEST FOR PRODUCTION NO. 40:**

4 One copy of each of WWE's quarterly and annual financial statements and reports.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

6 WWE objects to Request No. 40 as premature because discovery is not yet open in this case,
7 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
8 No. 40 to the extent that it calls for the production of documents unrelated to this matter, is
9 overbroad and unduly burdensome, is vague, and seeks documents that are not relevant to any
10 party's claim or defense in this case and not reasonably calculated to lead to the discovery of
11 admissible evidence proportional to the needs of the case.

12 Subject to and without waiving the foregoing objections, WWE states that, as a publicly
13 traded company, its quarterly and annual financial statements and reports are publicly available at
14 www.sec.gov.

15 **REQUEST FOR PRODUCTION NO. 41:**

16 One copy of each U.S. tax return (federal and state) filed by WWE.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

18 WWE objects to Request No. 41 as premature because discovery is not yet open in this case,
19 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
20 No. 41 to the extent that it calls for the production of highly sensitive documents unrelated to this
21 matter which seek information not related to any of MLW's asserted claims and not reasonably
22 calculated to lead to the discovery of relevant, admissible evidence.

23 Subject to and without waiving the foregoing objections, WWE states that it will not
24 produce a copy of its U.S. tax returns. As a publicly traded company, WWE's financials are publicly
25 available at www.sec.gov.

REQUEST FOR PRODUCTION NO. 42:

All documents evidencing your ability to satisfy a judgment in this Action, including all documents concerning any financial reserve or amount to cover estimated or potential liabilities, settlements or other expenses which may result from this Action.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

WWE objects to Request No. 42 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 42 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents related to an undefined “judgment” in the case, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to the extent that Request No. 42 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that as a publicly traded company, its financials are publicly available at www.sec.gov. WWE will not produce further materials responsive to Request No. 42.

REQUEST FOR PRODUCTION NO. 43:

All documents concerning this Action, including press releases.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

WWE objects to Request No. 43 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 43 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all documents concerning this Action,” and is not proportional to the needs of the case. WWE further objects to the extent that Request No. 43 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

1 Subject to and without waiving the foregoing objections, WWE states that it will not
 2 produce any responsive documents regarding Request No. 43 until discovery is open and a
 3 protective order and ESI protocols have been implemented. Once these are implemented and
 4 discovery opens, WWE will search for and produce responsive, non-privileged information based
 5 on agreed upon search terms. As to press releases, they are publically available at
 6 corporate.wwe.com/investors/news/press-releases.

7 **REQUEST FOR PRODUCTION NO. 44:**

8 All documents concerning written statements between you and third parties or your parent,
 9 subsidiary or affiliate corporations, partners, stockholders and/or shareholders concerning this
 10 Action.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

12 WWE objects to Request No. 44 as premature because discovery is not yet open in this case,
 13 no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request
 14 No. 44 to the extent that it calls for the production of documents unrelated to this matter, is
 15 overbroad and unduly burdensome, is vague in its request for “all documents” “concerning this
 16 Action,” and seeks documents that are not reasonably calculated to lead to the discovery of
 17 admissible evidence relevant to any party’s claim or defense in this case and not proportional to the
 18 needs of the case. WWE further objects to the extent that Request No. 44 seeks documents that are
 19 protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or
 20 any other applicable privilege or protection.

21 Subject to and without waiving the foregoing objections, WWE states that Request No. 44
 22 is duplicative of Request No. 43, and WWE will produce materials responsive to this Request in
 23 accordance with WWE’s response to Request No. 43.

24 **REQUEST FOR PRODUCTION NO. 45:**

25 All documents, regardless of date, concerning any policies and/or procedures concerning
 26 compliance with federal and state antitrust laws.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

WWE objects to Request No. 45 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 45 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. As written, this request seeks all policies and procedures dating back to the foundation of WWE in 1953 which is out of scope and not reasonably calculated to lead to the discovery of admissible evidence. WWE further objects to Request No. 45 because it seeks documents that are clearly protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

WWE will not produce materials responsive to Request No. 45.

REQUEST FOR PRODUCTION NO. 46:

All documents concerning each of the allegations in the Complaint and/or any denial or other contention or response you have with respect to each such allegation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

WWE objects to Request No. 46 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 46 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for “all” documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party’s claim or defense in this case and not proportional to the needs of the case. WWE further objects to Request No. 46 because it seeks documents that are clearly protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

WWE will not produce materials responsive to Request No. 46.

REQUEST FOR PRODUCTION NO. 47:

All documents concerning WWE's contracts with A&E, as well as documents concerning WWE partnerships or programs that A&E participates in or airs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

WWE objects to Request No. 47 as premature because discovery is not yet open in this case, no protective order is in place, and no ESI protocol has been implemented. WWE objects to Request No. 47 to the extent that it calls for the production of documents unrelated to this matter, is overbroad and unduly burdensome, is vague in its request for "all" documents, and seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence relevant to any party's claim or defense in this case and not proportional to the needs of the case. MLW has failed to assert any facts in the operative complaint, relative to its claims, to support such a broad request for documents concerning its contractual relationship with A&E. WWE further objects to the extent that Request No. 47 seeks documents that are protected by the attorney-client privilege, work product doctrine, the joint defense privilege and/or any other applicable privilege or protection.

Subject to and without waiving the foregoing objections, WWE states that it will not produce any responsive documents regarding Request No. 47 until discovery is open and a protective order and ESI protocols have been implemented. Once these are implemented and discovery opens, WWE will search for and produce responsive, non-privileged information based on agreed upon search terms.

1 Dated: December 23, 2022

Respectfully submitted,

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